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May 8, 2024

Honorable Steven L. Tiscione  
United States District Court,  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: *AutoExpo Ent. Inc., et al. v. Elyahou, et al.*,  
Case No.: 23-cv-9249

Dear Magistrate Tiscione:

As you are aware this firm represents, Omid Elyahou, and Simpsocial LLC, and Law Offices of Steven Cohn PC represent, Avi Eitan, Fifty Seven Consulting Corp. d/b/a Certified Auto Group a/k/a Certified Performance Motors, and Fazeeda Kassim, in the aforementioned matter.

By way of background on May 2, 2024, defendants by their respective counsel filed a Letter Motion for a stay discovery under Rule 26(c) pending a decision on our motion to dismiss the Complaint of the plaintiffs Autoexpo Ent. Inc., Peace Properties LLC, Network Reinsurance Company Inc., Auto Exchange Center, LLC, and Chrome Insurance Agency LLC (collectively, "Plaintiffs") under Fed. R. Civ. P. 12(b)(1) and (6) ("Motion to Dismiss"). (See Dkt. No. 24 and Dkt. No. 25).

On May 5, 2023 Your Honor Ordered, deferring ruling on [25] Motion for Discovery, and further that a motion hearing will be held at 2:00 p.m. on May 9, 2024.

On May 7, 2024, Plaintiffs' Counsel filed its Opposition (See Dkt. No. 27), whereby he attached a certain Exhibit A, a transcript from an unrelated matter.

As numerous references are made by respective Counsel in their filings about the Hearing before Honorable Orelia E. Merchanton April 12, 2024, in the interest of full transparency, I am hereby respectfully submitting the Transcript of said Hearing.

The Court's time and attention to this matter are greatly appreciated.

Respectfully submitted,  
*Matin Emouna*  
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